![Tennessee State Board of Education logo]

IEP Auditing Procedures for Special Populations

The purpose of this document is to provide procedural information regarding the auditing of student Individualized Education Programs (IEPs). These procedures cover the following:

- School Expectations for Auditing Files
- LEA File Auditing Process
  - During Audit
  - Post-Audit
  - Follow-Up
- IEP Contents
  - Section 1: Student Information
  - Section 2: Current Descriptive Information
  - Section 3: Present Levels of Performance (PLOPs)
  - Section 4: Consideration of Special Factors for IEP Development
  - Section 5: Measurable Annual Goals
  - Section 6: Program Participation
  - Section 7: State-District Mandated Tests and Accommodations
  - Section 8: Special Education and Related Services
  - Section 9: Transition Services
  - Section 10: Least Restrictive Environment (LRE)
- Forms and Appendices

School Expectations for Auditing Files

Each authorized charter school shall be responsible for internally auditing student IEPs and monitoring for compliance. Please see the IEP Auditing Checklist at the end of this document for an example form.

At the beginning of each school year, charter schools shall audit existing IEP files within the first month of school for all required documentation. Any new documents that are created for a student's IEP and supporting documents throughout the school year shall be maintained and monitored by the Case Manager.

(1) Signed and finalized copy of IEP/addendum should be added to student's file the day of the IEP meeting, or as soon as all of the signatures are obtained.

(2) Progress Reports should be added within two (2) weeks of end of quarter.

(3) Existing documents should be moved to the next applicable section of the IEP (i.e. Current IEP moved to Previous IEP section, and Previous IEP moved to the Old EE Document section)

LEA File Auditing Process

The State Board shall be responsible for auditing randomly-selected IEPs uploaded to EasyIEP annually. On-site auditing of randomly-selected cumulative folders will occur annually during school site visits. Additional monitoring may occur as needed.

During Audit.
(1) Utilize the IEP Auditing Checklist to check off what is included in the appropriate section of the IEP. Make note of what is missing or not instructionally appropriate.
(2) *For on-site monitoring:* Check to ensure all documents are also uploaded to Easy IEP.
(3) If a section is missing content, is instructionally inappropriate, or is missing required signatures, document this using the Missing IEP Contents memo.

Post-Audit.
(1) Send completed IEP Auditing Checklist to the special education director.
(2) If Missing IEP Contents memo was utilized, attach and send with checklist.

Follow-Up. If the Missing IEP Contents memo was utilized, the following steps should be taken:
(1) Two (2) weeks after communicating with the appropriate party utilizing the memo and checklist, check the student's IEP on EasyIEP to ensure proper corrections were made; *or* check to see that proper steps have been taken to reconvene the IEP team for another meeting to update the IEP, if necessary (check for invitation letter).

IEP Contents

Each authorized charter school is responsible for ensuring student IEPs maintain the following contents:

Section 1: Student Information
This section should include student demographics, area of disability, servicing school, medical information, and parent/guardian information.

Section 2: Current Descriptive Information
This section should include narratives regarding student strengths, parent(s)/guardian(s) concerns, and the effect a disability has on progress in the general education curriculum. It should be completed with input from the parent(s)/guardian(s) and additional members of the IEP team as appropriate, including Related Service Providers.

(1.) **Strengths.** Explicitly lists in which areas the student is strongest.
Example: "_____ demonstrates a strength in reading fluency."

(2.) **Parent/Guardian Concerns.** Prior to the meeting, parents/guardians should be asked about concerns regarding their student. These concerns should be noted in the draft form of the IEP and reconfirmed at the meeting, as well as addressing any additional concerns.

(3.) **Impact of Disability on Gen Ed Curriculum.** Specifically lists the student's disability and how the disability limits the student in the general education classroom. Additionally, lists some of the accommodations and modifications needed to help the student access the general education curriculum.
Example: "[Student]'s Specific Learning Disability in Reading Comprehension impacts her ability to understand and apply the content read in class, as well as on assignments and tests, throughout all of her general education classes. [Student] needs support to break down text, with frequent checks for understanding, to ensure she is following along with the class and/or material."

Section 3: Present Levels of Performance (PLOPs)
IDEA requires that a child be assessed in all areas related to his or her suspected disability. This evaluation must be sufficiently comprehensive so as to identify all of the child's special education and related service needs. The PLOPs should include norm and/or criterion referenced data, raw data, and descriptive information of the student's deficit area. IEPs should have at least 1 PLOP for each area of exceptionality.

This section outlines the area of need related to the student's disability and the current level of performance in those areas, and the IEP team uses the information in this section to determine appropriate annual goals and services. There are many different assessments that can be administered and included in this section. Data from these assessments should be used as the baseline upon which the IEP goals are based. The results included in this section are intended to be descriptive and specific and should be written in such a way that they can be understood by parents and teachers who may not be otherwise familiar with the student.

Example PLOP: "_(student name)_ took the __(year)_ _(Fall/Winter/Spring)___ Math MAP Assessment. He/she scored a _____. This score places him in the _____ percentile. This means that in a group of 100 ___ graders, he/she would outperform ____ other students. Performance

is comparable to students in the _____ grade level. He/she had strengths in _____ and
_____. He/she had weaknesses in _____ and _____."

- All PLOPs should include *at least* the results of the most recent individual academic assessments (i.e. MAP data, AIMSweb data, Dibels, SRI data, etc)

- Additionally, each Academic PLOP may include any of the following data sources:

GROUP 1: Standardized Testing	GROUP 2: Case Carrier Generated Data and Observations	GROUP 3: Review of Records and Reports
☐ District benchmarks	☐ Written informal assessment completed by case carrier	☐ PowerSchool reports from other classroom
☐ SRI/Lexile score	☐ Work samples completed with case carrier	☐ General Education or other teacher report

☐ Standardized testing
  ▪ Woodcock Johnson
  ▪ Brigance
  ▪ WIAT
  ▪ Casey Life Assessment
  ▪ Curriculum Based Measures
	☐ Classroom observation completed by case carrier
	
	☐ Curriculum Based Measures (Read 180 and IReady data reports)
		☐ Work samples completed in another other classroom

- IEPs with **behavioral/social-emotional concerns and/or related disabilities** should contain the
  following:
  o Teacher Observation (to be completed by someone other than the Exceptional Education teacher and preferably different from teacher completing Prevocational Checklist); and/or
  o Social-emotional behavior assessment/inventory

Determining Exceptionality. Within each assessment or indicator of academic performance, it is necessary to note if the child is exceptional in the given area for planning and goal setting purposes. The Tennessee Department of Education RTI program defines "exceptional" within these areas as scoring in the 25th percentile or below in a specific academic area or one standard deviation above or below measured cognitive ability. The IEP Team will determine if prevocational and/or social-emotional behaviors and characteristics are developmentally appropriate and determine if goals are appropriate, but typically goals are created when an area of concern is noted on the prevocational checklist or if a student has an FBA/BIP.

Example: "A 6th grade student scored in the 18th percentile on a grade-level passage on a nationally normed reading fluency benchmark. "

Section 4: Consideration of Special Factors for IEP Development
This section should indicate "yes" or "no" for the following considerations:
(1) Limited English Proficiency*
(2) Blind/Visually Impaired
(3) Communication Needs
(4) Deaf/Hard of Hearing
(5) Assistive Technology

(6) Student Behavior**
(7) Cognitive Processing Deficits***

* This would be marked "yes" if the student was a current English Language (EL student).
** This would be marked "yes" if the student had behavior goals on his/her IEP, an FBA/BIP, and/or if the student has had a Manifestation Determination Review meeting.
*** Consult the student's most recent evaluation and the School Psychologist. If the student scored below a 77 on one or more of the areas of cognitive processing (i.e. Working Memory, Processing Speed, etc), this should be marked "yes" and explained.

Section 5: Measurable Annual Goals

These are goals that identify what specific knowledge, skills, and/or behaviors a student is expected to be able to demonstrate within the annual IEP timeframe. Goals should address the needs that are summarized in the child's present levels of academic achievement and functional performance. Each PLOP marked as "exceptional" must have a corresponding goal.

A measurable annual goal must be written for the following areas, if applicable: Academics, Prevocational, Transitional, and Social-Emotional Behavior. Measurable annual goals provide a mechanism for determining whether the child is progressing in the general education curriculum and special education program. Progress on the measurable annual goals must be quantified on the Quarterly Progress Reports.

Best Practices.
(1) If possible, list the skill needed to acquire the goal so whoever picks up the IEP knows exactly what the student is working on.
(2) The goal should be set based off of the baseline data from the PLOPs.
(3) If necessary, use pre-existing progress monitoring tools (for example, AIMSweb, Wilson Just Words, F & P, gen ed classroom materials etc.) that are already being given to collect data and avoid having to create teacher-made tools and/or over-assessing students.

Writing Measurable Annual Goals. Strong measurable annual goals have the following components:
(1) Condition
(2) Student Name
(3) Clearly Defined Behavior
(4) Performance Criteria

Examples:

- "Given __(condition/materials/setting/accommodations)_ , _(student's name)_ will _(do what measurable/observable skill/behavior in functional terms)_ , _(to what extent/how well to determine mastery)_ , _(# of times/frequency/how consistency)_, by _(how often) evaluated/determined by_ _(measure)_."

- *Reading:* Given a reading passage at Joseph's instructional level, Joseph will read 80 words in 1 minute with 95% accuracy on 3 consecutive probes using a weekly R-CBM (reading curriculum based measure).

- *Behavior:* During unstructured tasks, Jaqueline will remain within her desk work area, defined by tape and furniture, with no more than 1 prompt for 80% of the activities within the school week as measured by an observation tool.

- *Social Emotional:* Given small group activities, Isaac will participate as defined by sitting with his group and answering or asking 2 questions on topic for 80% of the opportunities given within a 2 week period.

Section 6: Program Participation

This section outlines the areas in which a student will receive modifications or accommodations. It also details the specifics of those modifications or accommodations.

(1) Modifications or accommodations can be selected for any area in which a student participates: core academic classroom, enrichment opportunities, extracurricular activities, lunch, recess, etc.
(2) Accommodations and modifications can be incorporated into any combination of program and different accommodations and/or modifications can be put in place for different subjects.
(3) It is important to select appropriate accommodations and modifications based on the individual child's needs and deficits as seen in the PLOPs.
(4) Accommodations and modifications should only be listed for subject areas in which the disability is present.
(5) Clarify between "not applicable" if the student does not take a specific course OR "no accommodations" if a student does not need accommodations for a specific course

Section 7: State/District Mandated Tests and Accommodations

State/District Mandated Tests. Any state or district mandated test that the student will be participating in during the duration of this IEP should be indicated in this section. Options for selection include but are not limited to:
(1) TCAP/TNReady Achievement tests
(2) End of Course Exams (EOC)
(3) English Linguistically Simplified Assessment (ELSA)
(4) TCAP Writing Test.

State/District Tests Accommodations. Accommodations listed must be provided in general and special education classroom instruction, classroom testing, and for the specific assessment(s) listed in this section. The charts below outline the most common testing conditions and accommodations. The list is not exhaustive, but will help identify which features require an IEP/504 Plan, an English Learner 18 (EL) status, or are open to any student who needs it. It is a requirement that the feature is used consistently in class before it is allowed on any State assessments.

Testing Conditions	ELA / SS			Math			Science		
	IEP / 504	EL	Any	IEP / 504	EL	Any	IEP / 504	EL	Any
Flexible Setting / Small Group			X			X			X
Student Reads Aloud to Self			X			X			X
Noise Buffer/FM System			X			X			X
Blank scratch or graph paper			X			X			X

Accessibility Features for All	ELA / SS			Math			Science		
	IEP / 504	EL	Any	IEP / 504	EL	Any	IEP / 504	EL	Any
Read Aloud / Human Signer for Test Instructions			X			X			X
Line Reader for text			X			X			X
Highlighter			X			X			X

Accessibility Features for All (identified in advance)	ELA / SS			Math			Science		
	IEP / 504	EL	Any	IEP / 504	EL	Any	IEP / 504	EL	Any
Magnification / Color Overlays / Masking			X			X			X
Read Aloud / Human Signer for Test Items	X					X	X	X	

Accommodations	ELA / SS			Math			Science		
	IEP / 504	EL	Any	IEP / 504	EL	Any	IEP / 504	EL	Any
Adult Transcription / Scribe	X			X					X
Assistive Technology (speech-to-text, word prediction)	X			X			X		
Braille/Large Print	X			X					X
Calculator						N/A*	X		
Extended Time	X	X		X	X		X	X	
Manipulatives							X		
Prompting Upon Request							X		
Rest / Breaks / Multiple Same Day Sessions	X	X		X	X				X
Read Aloud / Human Signer for Test Items	X					X	X	X	
Visual Representations for Math				X					
Word-to-Word Dictionary		X			X			X	

*A calculator is required for all students on calculator-allowed subtests. No students may access a calculator during the calculator-prohibited subtests.

Section 8: Special Education and Related Services

Special education and related services are individually determined by the IEP Team. Services hours determined by the IEP team should reflect the areas of exceptionality in the PLOPs and the areas addressed in the Measurable Annual Goals.

Related Services help children with disabilities benefit from their special education by providing extra help and support in needed areas, such as speaking or moving. Related services means transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education. These services include but are not limited to speech-language pathology and audiology services, occupational therapy, and counseling services.

It is the IEP team's responsibility to review all of the evaluation information, to identify what special education and related services the child needs, and to include them in the IEP. The IEP must also specify the following with respect to each service:
(1) *when* the service will begin;

(2) *who* is responsible for providing services;

(3) *how often* it will be provided and for what amount of time; and

(4) *where* it will be provided.

Section 9: Transition Services

This process is for students and their families, as well as all members of the IEP team, to think about life after high school, to identify a student's desired outcomes, and to plan their community and school experiences to ensure that the students acquire the knowledge and skills necessary to achieve their goals. For students 14 years and older during the IEP year, this process includes a transition assessment completed by the student.

Section 10: Least Restrictive Environment (LRE)

LRE and General Education. This section explains the extent, if any, in which the student *will not* participate with non-disabled peers.

Special Transportation. This section explains what special transportation, if any, is needed.

Extended School Year (ESY). This section explains if ESY is recommended.

Forms and Appendices

The following forms and appendices are included to supplement these procedures:

- [IEP Auditing Checklist](#) – *required*
- [Missing IEP Contents Memo](#) – *required, if applicable*

IEP Auditing Checklist

Date: _____   Auditor: _____

Section 1: Student Information
- ☐ Student Demographics
- ☐ Primary Disability
- ☐ Secondary Disability (if applicable)
- ☐ Servicing School
- ☐ Medical Information
- ☐ Parent/Guardian Information

Section 2: Current Descriptive Information
- ☐ Describes the student's strengths
- ☐ Describes the concerns of the parents regarding their student's education
- ☐ Describes how the student's disability adversely impacts his/her access to participation in the general curriculum

Section 3: Present Levels of Performance (PLOPs)
Each area related to the student's disability should include the following assessment information:
- ☐ Assessment Area
- ☐ Present Level of Performance
- ☐ Impact of Mastery of Standards
- ☐ Source of Information

For assessments and/or progress monitoring, include the following:
- ☐ Name of Test
- ☐ Date Administered
- ☐ Percentile Rank

Section 4: Consideration of Special Factors for IEP Development
IEP outlines "yes" or "no" for the following considerations:
- ☐ Limited English Proficiency
- ☐ Blind / Visually Impaired
- ☐ Communication Needs
- ☐ Deaf / Hard of Hearing
- ☐ Assistive Technology
- ☐ Student Behavior
- ☐ Cognitive Processing Deficits

Section 5: Measurable Annual Goals

Each goal should include the following information:

- ☐ Area of Need
- ☐ Annual Goal
- ☐ Personnel/Position Responsible

All goals should have the following components:

- ☐ Condition
- ☐ Student Name
- ☐ Clearly Defined Behavior
- ☐ Performance Criteria

Do goals exist for all PLOPs marked as "exceptional"?

- ☐ Yes
- ☐ No

Section 6: Program Participation

- ☐ Modifications and/or accommodations are based on student needs and deficits as outlined in the PLOPs.
- ☐ Modifications and/or accommodations are listed only for areas in which the disability is present.
- ☐ *When "not applicable" is marked:* Clarification is provided regarding whether "not applicable" is marked because the students does not take a specific course *or* because the student does not need accommodations for a specific course.

Section 7: State/District Mandated Tests and Accommodations

- ☐ State and/or district mandated tests that the student will be participating in during the duration of this IEP are outlined.
- ☐ Accommodations for testing are listed, if applicable.
- ☐ Accommodations are already consistently used in class prior to being allowed on State assessments (should match accommodations outlined in "Program Participation").

Section 8: Special Education and Related Services

- ☐ Related services and service hours reflect the areas of exceptionality outlined in the PLOPs and the areas addressed in the Measurable Annual Goals.

With respect to each service, the IEP specifies the following:

- ☐ *when* the service will begin
- ☐ *who* is responsible for providing services
- ☐ *how often* it will be provided and for what amount of time
- ☐ *where* it will be provided

Section 9: Transition Services

☐ *For students ages 14 & older:* Transition Assessment

Section 10: Least Restrictive Environment (LRE)
  ☐ <u>LRE & General Education</u>: Explains the extent, if any, in which the student *will not* participate with non-disabled peers
  ☐ <u>Special Transportation:</u> Explains what special transportation, if any, is needed.
  ☐ <u>Extended School Year (ESY):</u> Explains if ESY is recommended.

Required Signatures
  ☐ Signatures of parents/guardians and IEP team participants on the IEP signature page(s)

To: To Whom This May Concern

From:

Date:

Re: Special Education IEP Audit

Missing IEP Contents

This memo is to make notice of ☐ missing ☐ instructionally inappropriate contents in _____(student name)_____'s IEP. The State Board completed an internal audit of these files on ___(date)___, and found that the following contents were ☐ missing: _____(IEP section)_____. The following contents were found to be ☐ instructionally inappropriate based on this student's Present Levels of Performance: _____(IEP contents)_____.

Please make necessary changes within two (2) weeks, by __(date)___ making sure documentation is updated in both the student's cumulative file and on Easy IEP.
If you have questions, please contact the State Board.